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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARY C. DURHAM,

Plaintiff,

vs.

CSAA GENERAL INSURANCE COMPANY;
DOES 1 through X, inclusive and ROE
BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No. 2:14-cv-01332-JAD-PAL

**STATUS REPORT AND STIPULATION TO STAY PROCEEDINGS PENDING
SETTLEMENT**

COME NOW, Plaintiff, MARY C. DURHAM, and Defendant, CSAA GENERAL
INSURANCE COMPANY, by and through their respective counsels of record, and submit this
Status Report and Stipulation to Stay Proceedings Pending Settlement:

1. On January 13, 2015, the parties reached a settlement in the above-captioned
matter, and are currently in the process of preparing the settlement agreement and dismissal
paperwork. However, the parties have knowledge of a Medicare lien, making this process a bit
lengthier.

2. To allow the parties time to prepare the settlement agreement and dismissal paperwork, Plaintiff and Defendant submit this Stipulation to Stay Proceedings for 45 days, or until March 8, 2015. If any issues arise during this process, the parties will promptly advise the Court.

3. The cost of completing any discovery and Court-imposed deadlines at this time would undermine the agreed-upon settlement arrangement given the financial and time expense involved with meeting those deadlines. Staying those deadlines would effectuate the parties' mutual desire to decrease the cost of litigation pending settlement.

4. The parties submit that for all of the reasons set forth above, good cause exists to stay all proceedings in this case until March 8, 2015, and request that this Honorable Court enter an Order granting the same.

Dated this 29th day of January, 2015.

LADAH LAW FIRM

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PATRICK K MCKNIGHT, ESQ.
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Attorneys for Plaintiff

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IT IS SO ORDERED.

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UNITED STATES DISTRICT JUDGE
Dated: February 4, 2015.

Dated this ____ day of January, 2015.

ALVERSON, TAYLOR, MORTENSEN &
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See next page
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3. The cost of completing any discovery and Court-imposed deadlines at this time would undermine the agreed-upon settlement arrangement given the financial and time expense involved with meeting those deadlines. Staying those deadlines would effectuate the parties' mutual desire to decrease the cost of litigation pending settlement.

4. The parties submit that for all of the reasons set forth above, good cause exists to stay all proceedings in this case until March 8, 2015, and request that this Honorable Court enter an Order granting the same.

Dated this 30th day of January, 2015.

Dated this 3rd day of February, 2015.

LADAH LAW FIRM

ALVERSON, TAYLOR, MORTENSEN & SANDERS

/s/ Patrick K. McKnight, Esq.

/s/ Sabrina G. Wibicki, Esq.

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...

...

1 Dated this 29th day of January, 2015.

2 CURRIDEN, ARNESON & ANDERTON

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